

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

Sherline Jones

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

v.

Teresa Valverde
Merico Zanoliti
Dennis Haygood
David Stockwell

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

Case: 2:23-cv-10954

Assigned To : Cox, Sean F.

Referral Judge: Ivy, Curtis, Jr

Assign. Date : 4/21/2023

Description: CMP SHERLINE JONES
V TERESA VALVERDE ET AL (SS)

Complaint for a Civil Case

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Sherline Jones</u>
Street Address	<u>3107 Charter Oaks Drive</u>
City and County	<u>Davison - Genesee County</u>
State and Zip Code	<u>48423</u>
Telephone Number	<u>313-778-1372</u>
E-mail Address	<u>sherlinejones1@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Teresa Valverde</u>
Job or Title (if known)	<u>Section Chief</u>
Street Address	<u>10535 Hospital Way</u>
City and County	<u>Mather, Sacramento County</u>
State and Zip Code	<u>California, 95655</u>
Telephone Number	<u>916-843-7000</u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	<u>Merico Zanotti</u>
Job or Title (if known)	<u>Assistant Chief</u>
Street Address	<u>10535 Hospital Way</u>
City and County	<u>Mather, Sacramento County</u>
State and Zip Code	<u>California, 95655</u>
Telephone Number	<u>916-843-7000</u>
E-mail Address (if known)	<u></u>

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Defendant No. 3

Name	<u>David Stockwell</u>
Job or Title (if known)	<u>Director of Mather VA Medical Center</u>
Street Address	<u>10535 Hospital Way</u>
City and County	<u>Mather, Sacramento County</u>
State and Zip Code	<u>California, 95655</u>
Telephone Number	<u>916-843-7000</u>
E-mail Address (if known)	<u></u>

Defendant No. 4

Name	<u></u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question ☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Defamation of character. (see attached)

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Sherline Jones,
is a citizen of the State of (name) Michigan.

b. If the plaintiff is a corporation

The plaintiff, (name) _____,
is incorporated under the laws of the State of (name) _____,
and has its principal place of business in the
State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Teresa Valverde David Stockwell
Merrico Zannotti
Dennis Haywood, is a citizen of the
State of (name) California. Or is a citizen of (foreign
nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated
under the laws of the State of (name) _____, and
has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of
(foreign nation) _____, and has its principal place
of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Moving costs to California - \$5,000

Annual Salary of Job declined to take this job - \$65,000

Annual Salary of Job vacated to take this job - \$63,000

Annual salary of Job accepted - \$76,000

Loss of (VA) benefits to include retirement, 401K, paid time off, vision, medical dental \$500,000

Loss of tenure with company

Student Loans: \$250,000 (This would have been paid via Public Loan Forgiveness Program) with 20 more years of tenure in federal service

Defamation of character - anguish and suffering: \$500,000

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: April 21, _____, 2023.

Signature of Plaintiff



Printed Name of Plaintiff Sherline Jones

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

1 million dollars

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Defamation of Character

Breach of Contract

Please see attached

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Additional Information:

Please see attached.

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Sherline Jones

DEFENDANTS

Teresa Valverde
David Stockwell
Merico Zanotti

(b) County of Residence of First Listed Plaintiff _____

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 USC 1332

Brief description of cause:

Defamation, slander, libel with damages

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

October 15, 2020

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

Notes :

*The harassment portions have been filed via VA CEO
processes against the facility.*

Sherline Jones vs. Teresa Valverde

VA Supervisor, who is among the Christian community, believed the allegations on Christopher Cauley, VA Executive Director and posted a job for a Call Center Manager, occupational series 0300, which is an administrative classification series leading to supervisory administrative occupational series or SES progression series.

I passed the HR interview qualification based on experience and education. I have an MBA from a qualified and accredited institution – American Intercontinental University. I was interviewed by audio Teams by Teresa Valverde.

On or about April 21, 2022, Teresa Valverde contacted me by telephone to request names of references. I provided her the names of several directors that I personally worked for either directly or indirectly working on special projects which included Dr. Pamela Reeves-Former Director - Detroit, Mr. Chris Cauley (Saginaw-Detroit), Amy Lyons, Infection Control Manager-Ann Arbor - Retired, Michael Lyons, PA, VA Primary Care PACT Team Leader/Provider-Retired, LaShaun Marie Martin, EA to the Director-Detroit, Susan Yu, Assistant Director – Detroit, Belinda Brown-Tezera (Associate Director for Patient Care Services – Detroit, Scott Gruber, MD – Chief of Staff – Detroit. All of the references informed me that a great review was provided.

She called me back and specifically asked for Mr. Christopher Cauley's phone number. I provided Teresa Valverde a number to contact him.

On or about April 22, 2022, he contacted me and requested a meeting. I spoke with him, and he gave me a favorable reference but was not in favor of me taking the job. He suspected that there was suspicious activity. She told him as well as me that she needed a call center manager immediately but questioned that I had only been at the job six months. He concurred that I had been at the job six months but will normally stay at a location 1-2 years. I also shared this information with Teresa Valverde specifically explaining why I had been at the other locations for six months. I was returning from Texas and had been promoted while in Texas. To return to Michigan, I took a lower GS level and was promoted six months later.

On May 2, 2022, I was contacted by an HR Representative Tempest Copeland offering me the job. I then received a call from Teresa Valverde requesting the phone number of my supervisor who was Michael Deaton, MD, to obtain a clear date. Teresa also told Dr. Deaton that she needed someone immediately. Therefore, he released me to start at the next pay period which began on May 8, 2022. I arrived in Sacramento on May 8, 2022, and began the New Employee Orientation Class. On May 16, 2022, when I sat with Teresa, she stated that she wanted me to start from the ground up working as a MSA, taking calls, get tested, re-take all the training, everything, then she would move me to other MSA duties until I worked back up to the Call Center Manager. I informed her this is not what she stated in the interview, and I wanted to return home. My resume clearly outlines that I had been a MSA in the VA for over three years in every capacity of MSA role.

After 4 attempts to return home on LWOP to save my paid time off, she declined. She only approved me to leave using my paid time off and LWOP which she knew would exhaust my leave status and put me in an AWOL status, in which she could then begin termination processes. She hired me to fire me based on a rumor that was spread by Winifred Verse-Barry, that Mr. Cauley and I dated. He got mad that I left him for Marvin Sapp and planted a camera in my apartment in Grand Rapids and noted that I was a transgender female and because of that he was going to cut me from VA services.

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Sherline Jones vs. Teresa Valverde

I am a female from birth. I have never dated Chris Cauley. He has never been to my apartment, and I have never been to his home. However, I was a member of Marvin Sapps church for two years. He is friends with my ex-husband, Lawrence Bailey who planted the camera and photoshopped me. He used Marvin Sapp, Marvin Winans and Juanita Bynum to fame the lie. Consequently, resulting in people like Teresa Valverde believing the lie.

I have reported to government law enforcement agents and VA using VA reporting processes, that all of the references have been stalked and some have been targeted with complaints and some have been terminated from VA employment.

While in Sacramento, I had to file several police reports with my brother becoming violent. He has a history of domestic violence, alcoholism and rape. I moved out of his house and into a cheap hotel. He had also began stalking me along with my ex-husband. Even firing gunshots in the middle of the night, knocking on my door at 2 am. The cost of living in Sacramento was extremely high in comparison to take home pay and I had used my own resources to move to California. My credit card was maxed out and I had no extra money. When I explained this to Teresa, she failed to transfer me because she was using her official VA position to work with criminals. The VA Director, David Stockwell finally approved family medical leave act with a doctor's notice (Non-mental health related) personal reasons. However, instead of doing a hardship reassignment per the advice of the human resources, Teresa has tried to yet get me fired and spread rumors of me being a Veteran with mental illness to other hiring managers. She hired me to fire me and tried to blackball me from Federal employment and blame Mr. Cauley for her belligerent behavior.

I have contacted the managers in Michigan who are ready to facilitate a reassignment but Teresa nor anyone from Mather have contacted the managers.

When I apply for a job and try to transfer in that manner, she provides a negative reference and have removed me from the system making it appear as though I have been fired which is a negative appearance to hiring managers.

Also, when I arrived at station, Teresa had harassing behavior acting as though she was investigating VA cases that were actual VA court cases enacted as a class action case against Winifred Verse-Barry. However, Winifred told the preachers that it was me and Teresa believed the lies and began harassing me. This has been reported to VA via the EEO processes.

Meanwhile, I am filing this case against Teresa Valverde (person to person) for personal damages that she has caused me in defaming my character to not only VA hiring managers but external hiring commercial hiring managers making it difficult for me to obtain another position and grow in any career. At present, restarting a career at entry level at 54 years old, I would be unable to make even student loan payments and I would be removed from the public loan forgiveness program.

I am currently living from house to house paying room rent here and there because I cannot get approved for an apartment without having a job for more than one year (with VA I have tenure from December 2005).

She used her position in the VA in a negligent manner to produce harm to me. I am requesting restitution.

 - 4/21/2023

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